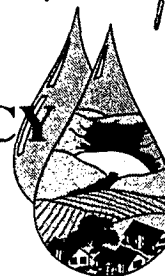


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SOLANO COUNTY WATER AGENCY



July 11, 1997

Mr. Rick Woodard
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Comments of the North Bay Aqueduct Contractors on CALFED's Water
Quality Program Programmatic Actions

Dear Rick:

The North Bay Aqueduct (NBA) Contractors have reviewed the Phase II Alternative Descriptions and the Water Quality Program Programmatic Actions contained in Appendix B of the alternatives report. We offer the following comments:

Alternative Intake for NBA

The NBA Contractors recommend that CALFED evaluate the feasibility of providing a second intake for the NBA to improve drinking water quality and provide operational flexibility. Although relocation of intakes to avoid contaminant sources is listed as an action in the Water Quality Program, none of the alternatives discussed in the Phase II Alternatives Descriptions report includes relocating or providing a second intake for the NBA Contractors. The NBA Contractors currently have the worst water quality of all State Water Contractors, we face significant challenges in treating Delta water to meet current regulations, and we anticipate even more difficulties as drinking water regulations become more stringent. A few of the water quality programmatic actions may improve source water quality at the NBA pumping plant; however, many of the alternatives divert fresh water from the Sacramento River or the Ship Channel and away from the NBA intake. This may result in worse water quality for the NBA Contractors.

The Ecosystem Restoration Program anticipates development of large areas of shallow water habitat in the vicinity of the NBA intake. The purpose of the shallow water habitat is to increase the populations of native species such as Delta smelt and splittail. This creates a major problem for the NBA since under the Delta Smelt Biological Opinion our pumping is restricted when larval Delta smelt are detected at the NBA. Increasing the breeding grounds for Delta smelt so close to the NBA will undoubtedly result in more Delta smelt being taken at the NBA pumping plant unless an alternative intake location is provided.

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Treatment and Source Control

The Water Quality Program includes an action to improve drinking water quality through various treatment techniques. Several of the NBA Contractors have already upgraded or are making plans to upgrade their treatment plants to include ozone or enhanced coagulation. Installation of membrane filtration is not economically feasible. Reliance on treatment technologies alone to address drinking water quality issues is not sufficiently protective of public health. Source water protection must be a component of CALFED's Water Quality Program and action strategies addressing parameters of concern to drinking water agencies must be included.

Monitoring Program

We support the need for the Comprehensive Monitoring, Assessment, and Research Program. We urge you to include monitoring for parameters of concern to drinking water agencies (total organic carbon, bromide, salinity, turbidity, pathogens) along with environmental monitoring in the program. The NBA pumping plant, Lindsey Slough, and the Yolo Bypass should be included in the monitoring program.

Agricultural Drainage

The Department of Water Resources is completing a one year monitoring program to identify the sources of pollutants to the NBA source water. The study has shown that local sources of pollutants are adversely affecting the source water quality. Runoff from agricultural crop land and grazing land is one potential source of organic carbon, turbidity, nutrients, and pathogens. We support CALFED's actions aimed at controlling these sources of contaminants.

We appreciate the opportunity to provide comments to CALFED on the Water Quality Program and look forward to continuing to work with you on this important aspect of the CALFED program. Please call me at (707) 451-2904 if you have any questions on our comments.

Sincerely,



David B. Okita
General Manager

cc: NBA Water Quality Committee

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